

Document Electronically Filed

July 15, 2025

Hon. Jennifer H. Rearden
 United States District Judge
 United States District Court for the
 Southern District of New York
 Daniel Patrick Moynihan U.S. Courthouse
 500 Pearl Street
 New York, NY 10007-1312

MEMO ENDORSED

USDC SDNY
 DOCUMENT
 ELECTRONICALLY FILED
 DOC #:
 DATE FILED: 7/25/25

Re: Dunn v. Commissioner of Social Security
Docket No: 1:25-cv-03282-JHR

Application GRANTED. SO ORDERED.

Barbara Moses

Barbara Moses
 United States Magistrate Judge
 July 25, 2025

Hon. Judge Rearden:

This letter respectfully requests an extension of time of sixty-one (61) days for Plaintiff to file Plaintiff's Brief in this matter, to September 22, 2025. Plaintiff's Brief is currently due on July 23, 2025; however, Plaintiff cannot complete the Brief on time for the reasons detailed below.

Counsel requests this extension due to multiple, simultaneous filing deadlines. Counsel requires additional time to prepare Plaintiff's brief properly and thoroughly. For instance, between July 11, and September 19, 2025, staff in Counsel's office have one hundred and eight-five (185) Plaintiff briefs due. This figure does not include briefings which will be due after the filing of Administrative Records throughout this timeframe, Oral Arguments, appeals to Circuit Courts, Reply Briefs, settlement negotiations, and the various other tasks which arise throughout the course of litigation. These circumstances do not allow for Plaintiff's Counsel to properly prepare the brief by the current deadline. This request will not cause Defendant any undue hardship. This extension is needed to prepare the brief thoroughly and properly.

Plaintiff's counsel has contacted Defense Counsel, who kindly consents to this request and has agreed to the below briefing schedule. This request will not cause Defendant any undue hardship. The parties have agreed on the briefing schedule below. This is Plaintiff's first request for an extension of time.

If Plaintiff's request is granted, the new briefing schedule would be:

- **Plaintiff's Brief is due on or before September 22, 2025;**
- **Defendant's Brief is due on or before November 21, 2025; and**
- **Plaintiff's Reply Brief, if any, is due on or before December 12, 2025.**

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Thank you for your consideration.

Respectfully submitted,

/s/ Howard D. Olinsky

Howard D. Olinsky, Esq.
Counsel for Plaintiff

CC [via ECF]: Fergus Kaiser, Esq., Attorney for Defendant

SO ORDERED.

Dated: July 25, 2025

A handwritten signature in blue ink, appearing to read 'Barbara Moses', is written over a horizontal line.

Barbara Moses
U.S. Magistrate Judge